

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BODUM USA, INC. )  
                      )  
Plaintiff,         ) Civil Action No.: 07 CV 6352  
                      )  
v.                  ) Judge Kendall  
                      )  
EPOCA, INC.,       ) Magistrate Judge Keys  
                      )  
Defendant.         )

**AGREED MOTION FOR EXTENSION OF TIME FOR  
DEFENDANT TO ANSWER OR OTHERWISE PLEAD**

Defendant Epoca, Inc. (“Defendant”) respectfully requests a 45-day extension of time to answer or otherwise plead. Plaintiff’s counsel has agreed to this extension. In support of this motion, Defendant states as follows:

1.      Defendant was served with the summons and complaint on November 16, 2007.

Defendant’s answer is therefore due on December 6, 2007.

2.      The parties have been conducting settlement negotiations in an effort to resolve this dispute. The parties believe that such negotiations can be fruitful, and that it would be the best use of the parties’ and judicial resources if negotiations would continue.

3.      Defendant’s counsel has conferred with Plaintiff’s counsel, and Plaintiff’s counsel agrees to this proposed extension.

4.      This is the first request for additional time to answer or otherwise plead.

WHEREFORE, Defendant, Epoca, Inc., respectfully request that this Court grant it an extension of forty-five (45) days, or until January 21, 2008, to answer or otherwise plead.

Respectfully submitted,

EPOCA, INC.

Date: December 6, 2007

By: s/ Mark R. Bagley

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Mark R. Bagley  
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Attorneys for Defendant  
EPOCA, INC.

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing **AGREED MOTION FOR EXTENSION OF TIME FOR DEFENDANT TO ANSWER OR OTHERWISE PLEAD** was served via the Northern District of Illinois electronic filing system to:

David E. Bennett  
Jared C. Jodrey  
Vedder, Price, Kaufman & Kammholz, P.C.  
222 North LaSalle Street, Suite 2600  
Chicago, Illinois 60601-1003

on this 6<sup>th</sup> day of December, 2007.

s/ Mark R. Bagley

Mark R. Bagley